

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
(TRENTON)**

THOMAS J. MCCUE,

Plaintiff,

v.

EMIGRANT MORTGAGE COMPANY,
INC., AND EMIGRANT SAVINGS BANK

Defendant.

CIVIL ACTION NO.: 1:16-CV-00960-JBS-JS

Civil Action

**MOTION OF PLAINTIFF THOMAS J. MCCUE TO SHORTEN TIME FOR
THE EMERGENCY MOTION FOR PRELIMINARY INJUNCTION**

1. Mr. McCue filed the initial complaint on February 22, 2016 and all facts in that case are incorporated by reference here.
2. The motion for preliminary injunction was filed the next day, February 23, 2016.
3. At that time, an eviction had started that day, and as such, his intention to try and stop the proceeding and be permitted back into his property prior to completion.
4. There is a significant amount of personal property remaining on the property inside and outside of the residence.
5. The movers had made it clear that property is simply going to be thrown out as opposed to stored at this time.
6. Opposing counsel for the underlying matter has been given notice of the complaint and will get notice of this immediately pleading.

7. We are asking that the preliminary injunction be heard and granted immediately to avoid further extraordinary injury to Plaintiff.

WHEREFORE, Plaintiff respectfully request that this Court immediately enter an Order granting temporary and permanent injunctive relief expressly precluding and cancelling the remaining Eviction proceedings that commenced on February 22, 2016 for the reasons set forth herein, and for any other and further relief which is just and proper.

Respectfully Submitted,

/s/ Joshua L. Thomas
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Attorneys for Plaintiff
THOMAS J. MCCUE

CERTIFICATION

I, the undersigned attorney certify that I served a copy of this Pleading on the below on February 26, 2016 via e-mail to:

KLEHR HARRISON HARVEY BRANZBURG LLP
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Email: NYackle@klehr.com

Dated: February 26, 2016

/s/ Joshua L. Thomas
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Attorneys for Plaintiff
THOMAS J. MCCUE